

1 May 2008

Christopher Kent, EPA Product Manager
ENERGY STAR Product Specification Development
U.S. Environmental Protection Agency
Washington, DC 20460

Dear Christopher,

Thank you for allowing manufacturers to provide comments to the Tier 2 Imaging Equipment Specification proposal. While we have provided specific comments below, I wanted to take this opportunity on behalf of Xerox to express our continuing concern that EPA is not developing Energy Star specifications for the entire range of commercial marking technologies that are currently on the market. Instead, EPA continues to limit ENERGY STAR program to mature printing technologies such as ink jet and laser technology to the detriment of the consumer and the environment. Xerox has repeatedly brought to EPA's attention a whole category of less mature marking technologies that could genuinely benefit by being included in a separate category of Energy Star products for less mature technologies. While these technologies may require more power in the "use phase" of the product life-cycle, they deliver power reduction and other environmental benefits in other "phases" of the product life-cycle. Moreover, they deliver unique customer value propositions. Consequently, by continuing to focus on a single environmental parameter, ENERGY STAR creates unintended consequences of increasing impacts on the environment and/or stifling innovation that will deliver more significant environmental benefits.

As discussed during our meeting earlier this year, solid ink printing technology is one such case and Xerox is also currently working on other technologies that will deliver energy efficiency benefits that will far out-weigh the incremental power required in the "use phase". With the refusal of EPA to address the weaknesses in the program, Xerox will likely have to make the decision to kill new technologies currently in R&D rather than spend significant resources on commercialization only to be kept out of the market by ENERGY STAR. Xerox remains deeply disappointed and concerned that EPA has not addressed our ongoing concerns and instead continues to provide unique accommodations for technologies such as high performance ink jet which is unique to a single manufacturer. By way of this letter, we are requesting to elevate this discussion in EPA and will be contacting you to schedule a meeting.

Comments specific to the draft tier 2 document are as follows:

1) While we believe EPA has attempted to collect full market data to ensure a more representative look at the market (which is essential before setting new specifications), the total eligible product numbers seem low. Did your data include all speed bands and all technologies (Dye Sublimation, Stencil, Thermal Transfer, EP, SI and high performance inkjet)? Were products from all market segments (personal, workgroup and high end business) included? Since it is difficult to get a complete picture of the market, Xerox recommends the qualified product percentages be increased by a small amount to accommodate for gaps in representations of the total market.

2) EPA has indicated the definition of DFE is not clear enough. Please indicate what the nature of the confusion is so we can offer alternative definitions.

3) With the proposal to apply identical specifications to MFDs and printers, this proposal ignores the additional functionality delivered by multifunction products. While multifunction devices use more energy than printers, they deliver proportionately more energy savings by replacing the need for multiple personal and single function devices. Typically MFD technology will use 20-35% more energy than a single function unit. This additional power is due to additional processing capabilities and various other options. This incremental consumption is more than offset by the power that is saved. In fact, Xerox has significant experience in working with our customers to demonstrate that optimizing around MFD technology, energy consumption is typically cut in half. This allotment is especially critical in the 30-60 ppm range where fewer products are represented in TEC3 and TEC4. Xerox recommends an additional flat allowance in these speed ranges to allow for increased functionality.

Additionally, after 50 ipm, there are few products that meet ENERGY STAR Tier 1. Xerox would like to better understand the process for drawing the specification line in these speed bands.

4) Xerox is interested in ensuring only commercial and personal imaging equipment is included in ENERGY STAR. It has always been understood industrial and production units do not meet the spirit or intent of the specifications. Xerox is happy to work with EPA to clarify the scope by speed of the equipment, market segment, or some other measure. We will take the initiative to work on a proposal that is based on technology changes by speed for both monochrome and color products.

Please feel free to contact me with any questions. In the meantime, we will be requesting a meeting with EPA to discuss our concern about ENERGY STAR exclusion on newer technologies.

Sincerely,



Patricia Calkins
Vice President
Environment, Health & Safety
Xerox Corporation